

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

July 20, 2021

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

We write on behalf of the Plaintiffs' Executive Committees to request an extension of time by which we must submit a reply in support of our Fed.R.Civ.P. 72 Objections to the Magistrate Judge's June 15, 2021 Order, ECF No. 6864.

As the Court knows, Plaintiffs have three charity expert depositions this week as well as the reply to the FBI opposition to their Rule 72 objections due on July 26, 2021. Additionally, in its July 13, 2021 opposition, the Kingdom raised arguments concerning the substance of the deposition that Plaintiffs must address, requiring additional review of the Jarrah deposition transcript.

To provide the necessary time to adequately address the Kingdom's opposition while handling the other case-related duties, Plaintiffs respectfully request that this Court extend the time by which their reply in support of their Rule 72 Objections to the June 15, 2021 Order (ECF No. 6864) be due until July 29, 2021. This is the first request for an extension of time and Defendants do not object to the request.

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Respectfully submitted,

KREINDLER & KREINDLER

/s/ Megan W. Benett

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For the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims

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/s/ Robert T. Haefele

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For the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims

COZEN O'CONNOR

/s/ Sean P. Carter

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For the MDL 1570 Plaintiffs' Exec.
Committee for Commercial Claims

cc: All Counsel via ECF/CM